REMARKS

Claims 1-4, 6, and 11-13 stand rejected under 35 USC 103(a) as obvious over Kinoshita. In particular, the Examiner alleges that, because Kinoshita mentions a group of chemicals that contain the chemicals recited in claim 1—namely titanium acylate and titanium chelate—which may be present up to 0.05-8 wt % as crosslinkable compounds and a copolyester containing a sulfonated comonomer such as 5-sodium-sulfo-isophthalic acid which may be present up to 50-100 wt% as a binder in Kinoshita's coating solution, the claimed readily-adhesive polyester film would have been obvious in view of Kinoshita (Action, page 2, lines 12-16). Applicants respectfully traverse this rejection.

Independent claims 4, 5 and 6 recite a readily-adhesive polyester film with a coating layer formed with an aqueous coating liquid specifically containing the combination of "(A) an aqueous polyester resin and (B) at least one compound selected from the group consisting of a water-soluble titanium chelate compound, a water-soluble titanium acylate compound, a water-soluble zirconium chelate compound and a water-soluble zirconium acylate compound," the mixing ratio (A)/(B) ranging from 10/90 to 59.3/40.7. Independent claim 1 recites a similar composition with component (B) being either a titanium chelate or a titanium acylate compound. Other pending claims depend from claims 1, 4, 5 or 6. The resulting readily adhesive coating layer of the claimed invention exhibits an excellent adhesion to a hard coating layer while suppressing the rainbow reflection at the interface of the adhesive coating layer and the hard coating layer (Specification, page 5, line 28 to page 6, line 7). This adhesive layer can only be obtained by carefully selecting the components as claimed. For example, a water-insoluble titanium compound—as opposed to a water-soluble titanium chelate or acylate compound—would not result in a transparent film suitable for producing the claimed readily-adhesive polyester film.

Kinoshita lists many different types of resins and chemicals as the potential binder and potential crosslinking agent of its coating solution (Kinoshita, column 5, lines 43-49; column 7, line

17-27; column 15, line 39-column 17, line 9). While some water-soluble titanium compounds and polyesters are among this list of chemicals, most of these chemicals have nothing to do with the claimed invention. For example, while Kinoshita lists diisoproporxybis(acetylacetonato)titanium—a water-soluble titanium compound, other titanium compounds listed in Kinoshita such as tetrabutoxy titanium are water insoluble and would not result in the desired transparent coating layer. In fact, most of these chemicals would result in coating layers that are ill-suited to form the claimed readily-adhesive polyester film. Thus, the long list of chemicals and the broad ranges of mixing ratios provided in Kinoshita would not have given a person of ordinary skill in the art a reason to select the particular components and composition ranges of the claimed coating layer that is suitable for forming a readily-adhesive polyester film for optical applications.

Further, the Examiner relies on hindsight to arrive at the claimed invention. The disclosure of Kinoshita would not have provided sufficient guidance to a person of ordinary skill in the art to form the claimed readily-adhesive polyester film. Kinoshita's coating solutions are compositions for producing coatings with oligomer deposition-preventing properties in laminates for recording information using a laser—a monochromatic light source that does not produce rainbow reflections. Kinoshita does not disclose or suggest how to reduce rainbow reflection. Without disclosing the specific combination of components necessary to form the claimed coating layer and without providing any guidance as to how rainbow reflection can be reduced—combined with the unpredictable nature of chemical arts, a person of ordinary skill in the art would not have found it obvious to arrive at the claimed invention. Accordingly, the above rejection should be withdrawn at least for these reasons.

Claims 5 and 7-10 stand rejected under 35 USC 103(a) as obvious over Kinoshita in view of Nakayama. As stated above, Kinoshita fails to disclose or suggest the coating layer recited in claims 1, 4, 5, and 7. Nakayam fails to teach any readily-adhesive coating layer comprising a

crosslinked polyester resin. Accordingly, none of the cited references discloses or suggests the claimed coating layer, and this rejection should be withdrawn.

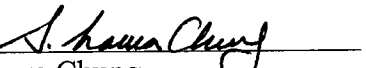
Finally, claims 14 and 15 are new. Support for these claims can be found on page 11, line 27, to page 12, line 7, of this application. The titanium compounds and zirconium compounds specifically recited in these claims are not disclosed in Kinoshita. Nakayama also fails to disclose the same. Accordingly, at least for this reason, new claims 14 and 15 are patentable over the references cited by the Examiner.

In view of the above, each of the claims in this application is in condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. **427972000700**.

Dated: August 18, 2008

Respectfully submitted,

By 

S. Laura Chung
Registration No.: 59,875
MORRISON & FOERSTER LLP
1650 Tysons Blvd, Suite 400
McLean, Virginia 22102
(703) 760-7312